



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF STATE COUNSEL
LITIGATION BUREAU

October 8, 2020

BY ECF

Hon. Raymond J. Dearie
United State District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jones v. Stanford, et al., 20-CV-1332 (RJD) (SJB)

Dear Judge Dearie:

This Office represents Defendants in the above-captioned action. We write to respectfully request that the stay of that aspect of the Court's September 9, 2020 Preliminary Injunction Order granting facial relief beyond the party-plaintiffs be extended by one week, from October 9, 2020, until October 16, 2020, and that Defendants' time to prepare and propose a Plan for developing policies and procedures to fully implement the Order as to non-party parolees without creating undue public risk be extended for that period as well.

The reason for the request is that despite Defendants' best efforts, we are still endeavoring to identify which parolees are sexual offender registrants subject to e-STOP; how to efficiently correct the parolees' files and provide notice to those registrants whose restrictions on accessing commercial social media websites under the e-STOP condition are to be removed; and estimate the amount of time it will take to implement the Plan.

Plaintiffs have declined to consent to this request. On September 16, 2020 (ECF #39), Defendants requested a thirty day stay of the Order, until October 9, 2020, as to non-plaintiff parolees, and that they be given until that date to prepare and submit to the Court a proposed Plan and schedule, which request was granted. (See September 22, 2020 minute entry).

Thank you for your time and consideration in this regard.

Respectfully yours,

/s/ Bruce J. Turkle

Bruce J. Turkle

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